

6 September 2006

COASTAL CONSERVATION ASSOCIATION of VIRGINIA
2100 Marina Shores Dr., Suite 100
Virginia Beach, Va. 23451

Virginia Recreational Fishing Advisory Board
C/O Jack Travelstead
Virginia Marine Resources Commission
2600 Washington Avenue, 3rd Floor
Newport News, VA 23607

Dear RFAB Members:

The CCA of Virginia Fisheries Management Committee has reviewed the proposals submitted to your board and has formulated the following positions.

Multi-Year Projects for Renewal:

A. Federal Assistance (Wallop-Breaux) Matching Funds FY 2007. **PARTIAL SUPPORT.** For the second consecutive year, we are pleased to see the commercial fund will be providing a portion to this match. While their proposed \$100,000 is much larger than the previous year, it is still less than the \$225,000 for which the recreational fund is being tapped, and short of our earlier positions that the commercial sector should provide at least 50% of this funding. At the time of the 2005 request, we also stated “any future requests for WB offset should be financed entirely from the commercial fund, given the rationale that the WB federal portion is itself derived indirectly from the recreational sector”, and “that it is important the RFAB stands firm in demanding 100% of matching funding be derived from the commercial industry in all subsequent funding cycles”. However, we do acknowledge that in the end, failure to fund this match would have detrimental consequences to our ability to effectively manage our finfish resources.

B. 2007 Children’s Fishing Clinic (Year 10). **SUPPORT.** We have been a strong advocate for this and other similar activities that introduce young people to the fun and ethics of sportfishing. As we have also pushed for the fund to establish a baseline amount of funding support that would be available to each sponsoring activity, it is gratifying to now see a degree of standardization in per child funding of these events. For example, a similar amount of funding and participation level is present in the other events below.

C. 2007 Kiwanis Club Children’s Fishing Clinic (Year 6). **SUPPORT.** Comments and rationale are identical to those for item "B" above.

D. 2007 CCA Tidewater Youth Fishing Day (Year 10). **SUPPORT.** Comments and rationale are identical to those for item "B" above.

E. Sheephead Population Dynamics in Chesapeake Bay (Year 2). **SUPPORT.** Our organization has been in the forefront in expressing concerns over the potential threat to this unregulated and rapidly expanding fishery. While our initial concerns first emerged over four years ago, the intervening timeframe has seen a “discovery” of the resource by recreational fishermen similar to that of the fast “learning curve” accompanying spadefish angling interest. As we stated last year in our initial support of this request, “while we perceive the definite need for at least some minimal form of protection for sheephead, we feel any such initiative is best based upon key life cycle and population structure data of those fish frequenting Virginia waters.” We therefore encouraged the local academic community to consider a comprehensive study to address the apparent lack of scientific data on this species. This study will provide fisheries managers with information necessary to more intelligently manage this species that has become very important to the state’s recreational anglers. The petitioners are to be commended for conscientiously providing feedback to the board and angling community on their initial progress/data. Some of these findings, most notably those concerning the apparent age of some of the specimens (i.e. 9 lbs = 17 yrs), tend to reinforce our concerns that this species will definitely require some protection in the form of enlightened limits. In fact, the VMRC should even be open to the concept of near-term management steps as early as 2007, if data from the study is compelling. Otherwise, a “routine” timeline might not dictate any action until after the conclusion of the entire three-year study in 2008 (with limit impositions enacted no earlier than 2009).

F. Artificial Reef, Funding for Deployment of Structure 2006-2007. **SUPPORT.** Perhaps no other request in this cycle more clearly targets the intent of this fund to directly target the needs of the state’s recreational anglers. Consequently, we not only support this request, but also suggest the board increase the amount given to as much as double the requested amount. This is warranted given there are two newly approved reefs and another proposed that would, along with existing complexes, benefit from as much augmentation as possible. Furthermore, recommend the deployment of the very promising structures described in proposal “L” below to existing complexes in the bay (a diversion of some funds from that project would facilitate this).

G. 2007 Virginia Game Fish Tagging (Year 13). **SUPPORT.** We remain committed to supporting this valuable, long-standing program. By continuing to provide critical data on virtually every recreational significant species, it has been extremely important in the successful management of our saltwater fishery. As we have noted previously, the program not only contributes valuable finfish data for scientific and management communities, but also attracts an expanding cadre of volunteer taggers who have helped expand the conservation ethic through their efforts.

H. Ocean View Recreational Fishing and Education Pier. **SUPPORT.** While we did not initially endorse the original proposal for this project last year, the petitioners have done an admirable job of addressing some of the concerns noted by our organization and members of the board. The new proposal package contains some of the most detailed and professionally presented data that we have seen, is totally focused on the physical

requirements of the project, and is devoid of the earlier, and inappropriate, figures for school supplies and research materials. As currently presented, the structure appears to provide a quality venue for local school children, while still providing unencumbered access for fishing to the surrounding community. As we understand there may be an issue of easement since a modification in the physical location of the structure, we recommend final approval by the board be contingent upon the successful resolution of this issue.

I. Monitoring Mycobacteriosis in Chesapeake Bay Striped Bass *Morone saxatilis*: Tracking the state of the Epizootic. **PARTIAL SUPPORT.** As we stated in our comments on the previous and similar proposals to study this affliction of striped bass, we continue to regard the project as important and appropriate for the fund to address. However, as we also noted, since “myco” is a threat and concern to both the recreational and commercial sectors, we remained committed to the principle that the commercial industry should be tapped to provide at least fifty per cent of the requested monies to conduct this study. Furthermore, any allocation from the recreational fund should be contingent upon a resolution of the conflicting statement in the cost section of the cover page of the proposal that states the “program is currently funded through federal and states sources, so the cost for the collection platform are already covered”. Furthermore, although it states the “project is being submitted for joint consideration by the RFAB and CFAB”, there is no evidence in the package that commercial funding is being sought.

J. Submerged Aquatic Vegetation (SAV) as essential fish habitat in lower Chesapeake Bay: Linking variation in SAV, forage animal production, and sportfish abundance. **QUALIFIED, LIMITED SUPPORT.** While our organization has a long-standing, unbroken record of supporting/approving every project to date related to the possible protection/revitalization of the Bay’s SAV habitat, we now find ourselves at a crossroads. The project summary of this particular proposal hopes to shed understanding on “how and why SAV habitats are essential to fish production”. While there may truly be benefits to learning more about the dynamics of this environment, it is generally conceded by most that these are extremely important environments critical to a host of species. Simply, we do not see the “deliverable” from this project as an immediate benefit to the recreational community. Our views on this project have also been tempered by the fact that, despite the completion of many other studies (most of which have been funded by this board), there has not been one action taken by the VMRC to protect or preserve this resource. Therefore, any support of this protect would be contingent upon VMRC/VIMS presenting a “way ahead” to facilitate the results of previous SAV studies into a plan of action to improve and protect of the Bay’s SAV habitat. For example, is there a plan of action for protecting SAV beds from the impact of Prop Scaring? In our positive remarks to last year’s request to support “Enhancing SAV Habitat: Research and Education for Restoration” we noted, “commercial activities deemed “detrimental” (haul seining, with associated prop scarring or any type of dredging) to this habitat should be prohibited. The lack of such safeguards would not only jeopardize the health of this habitat, but would also curtail any future support for using recreational monies in this regard.” Therefore, we cannot support this project, or similar ones in this vein, until there is a serious effort enacted to protect these areas.

K. A Genetic Assessment of the Potential for Local Depletion of Atlantic Menhaden (*Brevoortia tyrannus*) within Chesapeake Bay. **SUPPORT.** Given the acknowledged importance of this species as both a prime prey species and important filter feeder, our organization has been in the forefront of efforts to protect this important resource. Correspondingly, we also see the benefit that can be derived from data in this study. As with several projects each funding cycle, the activities of this proposal benefit both the recreational and commercial sectors. Therefore, the commercial sector should bear a portion of the cost for this study. However, unlike some past projects that crosscut both interest sectors, we feel the importance of this proposal is such that we could still support complete financing from our license fund if necessary.

L. Utility of Alternative Reefs to Simultaneously Enhance Recreational Fish Production and Oyster Restoration. **QUALIFIED SUPPORT.** While we support the concept of this proposal, our support is contingent on modification of two issues. First, recommend this project be consolidated with the related project below. There would seem to be no logical reason that these requests have been submitted as separate projects. Second, there should be a modification of the overall proposal to include location of one of these, or an additional one of like size/composition, to an existing deeper water locale within the bay. The placement of these structures on deeper water complexes could be affected through coordination with the long-standing Artificial Reef development program. This would facilitate a more timely determination of the structure's utility/value in meeting the study goals in a setting more conducive to supporting finfish noted in the proposal (tautog/sheepshead/etc.). A successful evaluation of the structure's effectiveness could then be more easily translated into the overall reef development program managed by the VMRC.

M. Prey Availability and Enhanced Production of Artificial Reefs for Recreational Fish and Native Oysters. **QUALIFIED SUPPORT.** See "L" above.

As always, we appreciate the opportunity to express our views on the disbursement of our state's license funds. Thank you for your consideration.

Larry Snider
RFAB Coordinator
CCA of Virginia